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Office of Air Waste & Toxics

December 15, 2007

Ms. Jan Palumbo (AWT-121)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Subject: **December 15, 2007, Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the December 15, 2007, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from November 15, 2007, to December 15, 2007.

Significant Developments This Period

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- During the reporting period, Baxter completed installation of extraction wells, monitoring wells, and LNAPL recovery wells; well development activities; vault construction; and trenching activities in accordance with the *Remedial Action Pilot Study Work Plan*.

Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to have contractors working at the facility during the next performance period, in accordance with the *Remedial Action Pilot Study Work Plan*. This work includes completing electrical and mechanical work, and initial testing of the pilot test remediation system.
- Groundwater monitoring activities will be conducted at the site beginning the week of January 7, 2008, in accordance with the *Remedial Action Pilot Study Performance Monitoring Plan*.
- The pilot test remediation system will be started after completion of groundwater monitoring activities scheduled for the week of January 7, 2008.

1700 El Camino Real, Suite 407 P.O. Box 5902 San Mateo, CA 94402
Phone 650 349 0201 Fax 650 570 6878



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December 15, 2007, Progress Report

Other Information

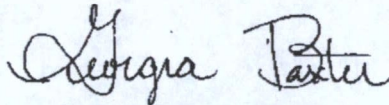
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

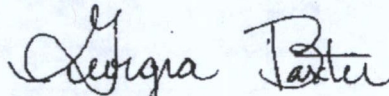
Signature:



Name: Georgia Baxter
Title: Chief Executive Officer
Date: December 15, 2007

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201

Sincerely,



Georgia Baxter
CEO

cc: Jeanne Tran, Ecology
RueAnn Thomas, Bluefield Holdings
Douglas Fox, Stella-Jones Corp.
J. Stephen Barnett, Premier Environmental Services, Inc.